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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

JABBAR SACHET AL-KHAFAGI,

Plaintiff,

v.

CHARLES C. SUNG, MD; (FNU) CRITES, Oregon State Correctional Institution (OSCI), Registered Nurse (RN); LORETTA IRVING, (OSCI) Medical Services Manager; CHRISTOPHER DIGIULIO, Oregon Department of Corrections (ODOC) Medical Director; JOE BUGHER, ODOC Health Services Administrator; and JOHN AND JANE DOES 1-20,

Defendants.

Case No. 2:19-CV-00669-MO

DEFENDANTS' THIRD MOTION FOR EXTENSION OF TIME TO FILE DISCOVERY, EXPERT DISCLOSURES, AND DISPOSITIVE MOTIONS

CERTIFICATE OF CONFERRAL

Pursuant to L.R. 7-1(a)(1)(C), counsel for defendants certifies that the plaintiff is a prisoner not represented by counsel and is presently in the custody of the Oregon Department of Corrections (ODOC).

Page 1 - DEFENDANTS' THIRD MOTION FOR EXTENSION OF TIME TO FILE DISCOVERY, EXPERT DISCLOSURES, AND DISPOSITIVE MOTIONS

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MOTION

The current deadline to file the discovery, expert disclosures, and dispositive motions in this case is **December 13, 2021**. (Order at ECF No. 68). Defendants respectfully request an extension of discovery, expert disclosures and dispositive motions for an additional one hundred and twenty (120) days, to and including **April 12, 2022**.

This motion is supported by the declaration of Robert Sullivan, Senior Assistant Attorney General, and the records and files herein.

DATED December 13, 2021.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

s/ Robert E. Sullivan
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Of Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that on December 13, 2021, I served the foregoing DEFENDANTS' THIRD MOTION FOR EXTENSION OF TIME TO FILE DISCOVERY, EXPERT DISCLOSURES, AND DISPOSITIVE MOTIONS upon the parties hereto by the method indicated below, and addressed to the following:

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 MAIL DELIVERY
 OVERNIGHT MAIL
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 E-MAIL
 E-SERVE

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